

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LADDY CURTIS VALENTINE and
RICHARD ELVIN KING, individually and
on behalf of those similarly situated,
Plaintiffs,

V.

BRYAN COLLIER, in his official capacity,
ROBERT HERRERA, in his official capacity,
And TEXAS DEPARTMENT OF CRIMINAL
JUSTICE,
Defendants.

Civil Action No. 4:20-cv-01115

DEFENDANTS' NOTICE OF FIFTH SUPPLEMENTAL DISCLOSURES

Defendants the Texas Department of Criminal Justice, Bryan Collier, and Robert Herrera. (“Defendants”), through their attorneys of record, advise the Court that on this date they have provided their Fifth Supplemental Disclosures to Plaintiffs, pursuant to FRCP 26(a)(1).

Respectfully Submitted,

KEN PAXTON

Attorney General of Texas

JEFFREY C. MATEER

First Assistant Attorney General

RYAN L. BANGERT

Deputy First Assistant Attorney General

DARREN L. MCCARTY

Deputy First Assistant Attorney General

SHANNA E. MOLINARE

Assistant Attorney General

Chief, Law Enforcement Defense Division

/s/ Christin Cobe Vasquez
CHRISTIN COBE VASQUEZ
Attorney-in-Charge
Texas State Bar No. 24074047
Federal Bar No. 1125898
Assistant Attorney General
Law Enforcement Defense Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
Telephone: (512) 475-4199
Facsimile: (512) 370-9996
Christin.Vasquez@oag.texas.gov

**ATTORNEYS FOR DEFENDANTS
TDCJ, COLLIER, AND HERRERA**

NOTICE OF ELECTRONIC FILING

I, **CHRISTIN COBE VASQUEZ**, Assistant Attorney General of Texas, certify that I have electronically submitted for filing the foregoing motion in accordance with the Electronic Case Files System of the Southern District of Texas, on June 25, 2020.

/s/ Christin Cobe Vasquez
CHRISTIN COBE VASQUEZ
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **CHRISTIN COBE VASQUEZ**, Assistant Attorney General of Texas, certify that the foregoing has been served *via* the electronic filing system of the Southern District of Texas, on June 25, 2020, addressed to:

JEFF@EDWARDS-LAW.COM
SCOTT MEDLOCK
SCOTT@EDWARDS-LAW.COM
MIKE SINGLEY
MIKE@EDWARDS-LAW.COM
DAVID JAMES
DAVID@EDWARDS-LAW.COM
Plaintiffs' Counsel

John Keville
JKeville@winston.com
Denise Scofield
dscofield@winston.com
Michael T. Murphy
MTMurphy@winston.com
Brandon W. Duke
bduke@winston.com
Benjamin D. Williams
bwilliams@winston.com
Robert L. Green
RLGreen@winston.com
Corienne Stone Hockman
CHockman@winston.com
Plaintiffs' Counsel

/s/ Christin Cobe Vasquez
CHRISTIN COBE VASQUEZ
Assistant Attorney General